

Laurel Hill Project Advisory Citizens Oversight Committee

Review and Observations of the Proposed National Register Nomination of the District of Columbia Workhouse and Reformatory Historic District at Laurel Hill



September 14, 2005

The Laurel Hill Project Advisory Citizens Oversight Committee was established by the Fairfax County Board of Supervisors in February 2005 to monitor the development of the Reformatory and Penitentiary area at Laurel Hill, adjacent to Silverbrook Road in Lorton, VA.

The Oversight Committee has reviewed the proposed National Register nomination of the proposed 512-acre District of Columbia Workhouse and Reformatory Historic District at Laurel Hill. The committee has developed a list of observations regarding the proposed nomination, prior to its final review and recommendations.

While the Oversight Committee has expressed support in concept for a proposed historic district at Laurel Hill, committee members will reserve final judgment regarding the proposed nomination until their next meeting, October 4, 2005, 7 p.m., in Conference Room 7 of the Fairfax County Government Center.

Summary of Observations

(Please see the corresponding numerals below for additional information)

- I. Placement on the National Register of Historic Places may qualify some projects for historic tax credits and grants. However, other projects, such as modifications to contributing structures or new construction may not qualify.
- II. While National Register placement is an honorary title, the Memorandum of Agreement in the deed of transfer stipulates that undertakings in the historic district are subject to review and approval by the Fairfax County Architectural Review Board (ARB). Historic Overlay District regulations note that, "No building or structure within any Historic Overlay District shall be razed, demolished, moved or relocated until such action is approved by the ARB and/or by the Board of Supervisors as provided in Sect. 204...."
- III. The Memorandum of Agreement in the deed of transfer stipulates that any contributing resource within the historic district that is proposed for demolition must be studied for the feasibility of reusing the resource.
- IV. The Fairfax County Architectural Review Board reviewed and approved development and re-use plans for contributing structures at the Workhouse (Lorton Arts Foundation site) in March, 2004.
- V. The Fairfax County Architectural Review Board has not yet developed guidelines for reviewing new construction and the exterior alteration of existing buildings, structures, and sites located within the Laurel Hill historic district as prescribed in historic district overlay regulations.
- VI. The current proposed nomination describes the period of historic significance for the district as 1910 to 1961. The previous draft said the period of significance is 1910 to 1955. There are questions as to whether the extended period represents a continuation of Progressive Era prison reforms or more contemporary penal philosophy.
- VII. The proposed nomination increases the number of contributing resources (buildings, sites, structures, objects, and other landscape features) and decreases the number of non-contributing resources from the original list in the deed of

transfer. The number of contributing resources has been increased from 136 to 194. The number of non-contributing resources has been decreased from 106 to 64.

VIII. Structures, sites, objects, and other features added to the list of contributing resources include, but are not limited to:

- Penitentiary Wall
- Prison Chapel
- Brick roads within the Reformatory and Penitentiary
- Spaces (exercise yards) between the Reformatory dormitories
- Reformatory perimeter roads
- Reformatory perimeter fence and gates
- Steam tunnels
- Brick-making kiln at the Occoquan Regional Park

The list of contributing resources also includes structures at the Workhouse which have been approved for demolition.

IX. The buildings in the Penitentiary quadrangle were listed in the original deed of transfer as contributing structures. The proposed nomination does not suggest they were part of the original plan envisioned by the 1908 Roosevelt Commission.

X. There are other issues in the proposed nomination for possible clarification, such as the location and time of incarceration of members of the Women's Suffrage movement in relation to the historic district.

Corresponding Numerals

I. Tax Credits and Grants

National Register placement may allow some projects to qualify for historic tax credits and grants. However, re-use projects involving historic properties must adhere to certain guidelines, including the Secretary of the Interior's Standards for rehabilitation (Section 106) to qualify for tax credits and grants. Some projects, including modifications of contributing structures or new construction, may not qualify.

II. Review and Approval of Undertakings within the Proposed Historic District

The establishment of a National Register district often parallels the development of a local historic overlay district, which makes the district subject to local ordinances and review.

In the case of Laurel Hill, the historic district is to be treated as a local historic overlay district, *even if it is not designated by the County as a local historic overlay district*. As such, undertakings within the district are to be reviewed by the Fairfax County Architectural Review Board (ARB).

This review of undertakings is described in the Memorandum of Agreement (MOA), which is included in the deed that transferred the entire Laurel Hill site from federal to county ownership:

General Stipulations

7) Review of undertakings within the Eligible District if the Eligible District is not a Fairfax County historic overlay district

If the Eligible District is not designated as a local historic overlay district, all parties to this MOA agree that any undertaking within the Eligible District shall be reviewed according to the following process:

- a) **For the purposes of this MOA, the ARB shall have those powers and responsibilities granted to it over the Eligible District that it has over a locally-designated Fairfax County historic overlay district, as defined in the Fairfax County Zoning Ordinance, Overlay and Commercial Revitalization District Regulations, Part 2, 7-200, et seq., Historic Overlay Districts. Undertakings that may affect structures with contributing interior features, as identified by Attachment A, shall also be subject to ARB review.**

Please note that the MOA stipulation listed above references contributing interior features, not just external features of contributing structures within the historic district.

Zoning Ordinance Article 7, "Overlay District Regulations," on the Fairfax County web site (<http://www.fairfaxcounty.gov/dpz/zoningordinance/articles/art07.pdf>), describes the review protocol for undertakings in historic overlay districts:

7-204 Administration of Historic Overlay District Regulations

Once established, Historic Overlay Districts shall be subject to administrative procedures for the enforcement of such regulations as provided in this Section.

- 1. All applications for rezoning, special exception, special permit, variance, sign permits, building permits, as qualified below, and all site plans, subdivision plats and grading plans shall be referred to the ARB for its review and recommendation in accordance with the provisions of this Part.**

and this...

In addition to the use limitations presented for the zoning districts in which a Historic Overlay District is located, the following use limitations shall apply:

- 1. No building or structure, as provided for in Sect. 204 above and no signs shall be erected, constructed, reconstructed, moved, externally remodeled or altered within any Historic Overlay District unless the same is approved by the ARB as being architecturally compatible with the historical, architectural, or cultural aspects of the district.**
- 2. No building or structure within any Historic Overlay District shall be razed, demolished, moved or relocated until such action is approved by the ARB and/or by the Board of Supervisors as provided in Sect. 204 above.**

III. Proposed Demolition of Contributing Structures

The Memorandum of Agreement in the deed of transfer stipulates that any contributing resource within the historic district that is proposed for demolition must be studied for the feasibility of reusing the resource.

Stated specifically in the MOA:

- 8) Adaptive use studies of contributing resources: If any contributing resources are proposed for demolition within the Eligible District, such resources shall be examined for the feasibility of adaptive use. The performance of such studies shall be the responsibility of the party proposing the demolition.**

There is no clarification within or attached to the proposed nomination as to whether the additional contributing resources in the nomination would be subject to feasibility studies if proposed for demolition.

IV. Development and Re-Use Projects at Laurel Hill With Contributing Structures

The Fairfax County Architectural Review Board (ARB) reviewed and approved the development and re-use plans for the contributing structures at the Workhouse in March, 2004. The Workhouse is the site of the Lorton Arts Foundation's "Workhouse Arts Center" and is located within the proposed historic district. The Lorton Arts Foundation project was reviewed and approved by the ARB prior to completion of the proposed National Register nomination.

V. Standards and Guidelines for the proposed historic district at Laurel Hill

Zoning Ordinance Article 7, "Overlay District Regulations," notes the following:

- 7. To facilitate the review of applications, the ARB shall formulate and adopt guidelines for new construction and the exterior alteration of existing buildings, structures, and sites located within Historic Overlay Districts....**

The Architectural Review Board has not yet developed these guidelines for the Laurel Hill historic district.

A recommendation for the ARB to develop standards and guidelines for the historic district was included in the recommendations developed by the Laurel Hill Adaptive Reuse Citizens Task Force and approved by the Fairfax County Board of Supervisors on December 6, 2004.

VI. Historic Context and Period of Significance

According to the Significance Summary of the proposed nomination, "The period of significance for the D.C. Workhouse and Reformatory Historic District extends from 1910 to 1961, beginning with the initial purchase of property for use as the D.C. Workhouse and ending with the dedication of the Reformatory Chapel (R-44)."

Previous Draft Nomination

According to the Significance Statement of the previous draft nomination, "The period of significance for the D.C. Workhouse and Reformatory Historic District begins in 1910 with the District of Columbia's initial purchase of the property for use as a workhouse and ends in 1955, the fifty-year cut off for eligibility to the National Register of Historic Places.

The previous draft nomination references the history of Progressive Penal reform at the D.C. Workhouse and Reformatory Historic District as 1910 – 1946.

The previous draft nomination was made available to the public on the Fairfax County government web site.

The following statements are used in both the previous draft and current nomination in support of the current period of significance (1910 – 1961) and the previous period of significance (1910 – 1955):

- "The District of Columbia penal system underwent reorganization in 1946 as the result of a study of the District of Columbia prison system by the Federal Government. This reorganization created the Department of Corrections providing the commissioners of the District of Columbia a direct line of communication and budget authority with the penal institutions. The creation of the Department of Corrections did not have a direct impact on the built environment at the D.C. Workhouse and Reformatory; rather, it had a larger effect on the programs of the institutions." (Oakey, *Journey from the Gallows*, 193-194)
- "The 1946 reorganization of the Workhouse and Reformatory into the new Department of Corrections impacted the programs offered at the penal institutions more than their built environment." Both the previous draft and the proposed nominations note that the reorganization also continued the Progressive ideals of the 1908 Penal Commission in that the focus of the institutions changed slightly to that of a "philosophy of rehabilitation through academic education and vocational training." (Oakey 173)
- "Due to an increasing population and overcrowding, a fence and permanent guard towers were built around the Reformatory complex from 1951 to 1952. Lights were added to this fence in 1953." (CDC, *Annual Report 1953*, 205)
- "Despite increasing tensions between the prisoners and administration in the 1960s, prison officials instituted programs that built bridges between the prisoners and the outside community. Some events that were part of this program included prisoners performing at concerts outside the institution, prison sports teams playing local teams and the Lorton Jazz Festival, an annual event that began in 1955 and continued into the late 1960s."
- "From their inception, the Workhouse and Reformatory included religious and recreational activities, as well as work, in prison life." (The proposed nomination notes that, "It was after the reorganization into the Department of Corrections that a separate building for religious services was built."

The previous draft nomination suggests that in spite of continuing construction and rehabilitative programs, the period of Progressive penal reform is 1910 – 1946 and the period of historic significance is 1910 – 1955.

There are questions as to whether construction of the prison chapel represents “the last in a series of social reforms at the prison” and a connection to the Progressive Era of prison reform as suggested in the proposed nomination, or is a reflection of more contemporary philosophies regarding incarceration and rehabilitation.

The estimated cost of asbestos abatement in the Prison Chapel is more than \$800,000, one of the highest estimated costs for abatement in the historic district.

The Prison Chapel is not incorporated into the re-use plan developed by the Laurel Hill Adaptive Reuse Citizens Task Force and approved by the Board of Supervisors on December 6, 2004.

- **Reformatory Exercise Yards** **S-02** **Built 1920-1930**

The proposed nomination notes that these narrow courtyards lie between the dormitory buildings lining the Reformatory Central Yard. The nomination states, "...the character of the exercise yards as paved recreation areas continues to contribute to the character of the site."

The Laurel Hill Adaptive Reuse Plan for the Reformatory area, as approved by the Board of Supervisors, anticipates utilizing the areas between every other dorm to provide space for residential units designed as loft style housing (for market and magnet housing).

- **Reformatory Perimeter Fence and Gates** **RO-07** **Built 1951-1952**

The proposed nomination states: "The approximately 15-foot-tall chain-link fence surrounding the Reformatory complex was built in 1951-1952 in this location, although some of the materials may have been replaced in later years as part of maintenance or security improvements. The entry gates to the complex are of chain link on large steel frames."

The inclusion of a chain link fence surrounding the Reformatory Area as a contributing object appears contrary to the Progressive Era context of the Reformatory (prisons without walls) and the construction of Colonial Revival-style brick structures.

- **Reformatory Steam Tunnels** **RT-09** **Built circa 1920**

According to the proposed nomination, "The Reformatory Steam Tunnel system consists of a series of tunnels connecting the individual buildings to the heating plant. The tunnels have brick walls and brick floors, with cast concrete ceilings, and are about 5 feet wide and about 5 feet high. The tunnels contain large welded pipes, wrapped in insulation, running just under the tunnel ceiling, which delivered steam to the building in question."

During the Laurel Hill Adaptive Reuse Citizens Task Force master planning process, engineering surveys determined that the Reformatory and Penitentiary areas would require new infrastructure, including water, sewer and other utilities. New infrastructure may or may not be compatible with the steam tunnel system.

- **Entrance Road to the Ref. And Pen.** **RT-19** **Built circa 1955**

The proposed nomination states, "Originating at Lorton Road, the approximately 1,900-foot-long drive merges into the Reformatory Perimeter Road east of the main gate at the southwestern corner of the fenced complex."

- **Reformatory Perimeter Road** **RT-20** **Built circa 1952**

According to the proposed nomination, this is a narrow, unstriped asphalt patrol road outside the Reformatory perimeter fence. It was likely configured when the fence was added in 1952.

- **Brick Roads (within Reformatory)** **RT-21** **Built before 1961**

The proposed nomination states, "Sections of brick-paved road remain within the Reformatory from the period of significance."

Workhouse Area

- **Control Building** **W-21** **Built 1940 – 1941**

This building has been approved for demolition.

- **OFACM Shops** **W-40** **Built 1940**

This building has been approved for demolition.

- **Administration Building** **WB-02** **Built 1941**

This building has been approved for demolition.

Brickyard Area

- **Beehive Kiln** **LT-07** **Built circa 1915**

The proposed nomination states, “The beehive kiln was constructed as part of the prison’s brick-making facility near the Occoquan River.” It is located within the Occoquan Regional Park.

- **Rail Line Trace (Lorton & Occoquan RR) T-09 Built 1914-1921**

The proposed nomination notes that the rail grade is now utilized as an entrance drive and a parallel separated bicycle path accessing the Occoquan Regional Park.

The proposed nomination notes that this section has been added to the historic district.

As noted, the buildings, structures, objects and sites in this document are listed as examples of resources that have been added to the list of contributing resources. This is not the complete list. The proposed nomination also includes a list of contributing and non-contributing resources for the Reformatory, Penitentiary and Workhouse (Lorton Arts Foundation site), as well as other areas within the historic district.

IX. Penitentiary

The proposed nomination notes that the three-member commission appointed by President Theodore Roosevelt in 1908 recommended construction of the Reformatory and Workhouse. The Commission recommended that “those worst offenders who are not proper subjects for either the reformatory or the workhouse” serve their sentences in federal prisons.

The proposed nomination notes that the inception of the Penitentiary did not occur until the late 1920s when federal penitentiaries were reaching capacity and the District of Columbia was ordered to incarcerate prisoners convicted of serious crimes. The nomination notes that, “Construction of the Penitentiary began in 1931 and it opened in 1941.”

X. Additional Issues

- **Women’s Suffrage Movement at the D.C. Workhouse, Women’s Division, 1917 – 1918**

The nomination notes that the Women’s Division of the Workhouse was established in 1912 on the west side of Ox Road with temporary frame buildings. The nomination also notes that the men’s division was located on the east side of Ox Road and was “completely segregated from the men’s department and no communication between the inmates of the separate groups [was] permitted.”

While the nomination notes that the structures in which the suffragettes were incarcerated no longer exist, it does not clarify that the location of those structures is not within the boundaries of the historic district.

The nomination does not highlight that the current brick structures considered for placement on the National Register did not exist when the suffragettes were incarcerated.

Note: The Oversight Committee supports the memorializing of the suffragette’s incarceration as an important event in national history.

- **Administration Building (Reformatory Area) Built 1952**

The Administration Building was built in 1952 and is listed as a contributing structure. It closes the western or fourth side of the Reformatory quadrangle. There is a question as to whether such a structure was envisioned in the original design for the Reformatory. The other two quadrangles (Workhouse and Penitentiary) have structures only on three sides.

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